

Maffey-FINAL

Designation List Report



Maffey, Meghan

2022-12-16

PL Designations	00:12:31
DEF Counter	00:35:51
PL Counter-Counter	00:00:09
TOTAL RUN TIME	00:48:30



Documents linked to video:

P-27

P-73






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DESIGNATION	SOURCE	DURATION	ID
7:13 - 7:16	Maffey, Meghan 2022-12-16 7:13 I know you've already done this, but I'm going to 7:14 ask, can you state your full name for the record one 7:15 more time, please. 7:16 A. Meghan Maffey.	00:00:06	Maffey-FINAL.1
8:24 - 9:07	Maffey, Meghan 2022-12-16 8:24 Are you aware that you've been listed 8:25 as a potential witness for Penn State University in 9:01 Meghan Maffey 9:02 this lawsuit? 9:03 A. Yes. 9:04 Q. Have you ever had communications with the 9:05 attorneys for Penn State, which would be Lucy 9:06 Wheatley or Claire Eller or anyone from the McGuire 9:07 Woods law firm?	00:00:21	Maffey-FINAL.2
9:15 - 10:16	Maffey, Meghan 2022-12-16 9:15 THE WITNESS: Yes. 9:16 BY MR. FETTERS: 9:17 Q. When was the first time that you had a 9:18 communication with an attorney from McGuire Woods? 9:19 A. I don't have an exact date. 9:20 Q. What's your best approximation? 9:21 A. Last month. 9:22 Q. Did they reach out to you or did you reach 9:23 out to them? 9:24 A. They reached out to me. 9:25 Q. Was that by phone or email? 10:01 Meghan Maffey 10:02 A. Phone. 10:03 Q. Do you recall who it was specifically? 10:04 A. Claire. 10:05 Q. At the time that Claire reached out to 10:06 you, was she acting as your attorney? 10:07 A. No. 10:08 Q. Had you ever spoken with Claire before 10:09 that phone call? 10:10 A. No. 10:11 Q. Did you discuss Claire representing you in 10:12 any capacity during that phone call? 10:13 A. I don't remember.	00:01:21	Maffey-FINAL.3

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DESIGNATION	SOURCE	DURATION	ID
	10:14 Q. Was there anyone else on that phone call, 10:15 or was it just you and Claire? 10:16 A. Just me and Claire.		
13:13 - 13:18	Maffey, Meghan 2022-12-16 13:13 Q. Well, let me just start foundationally 13:14 from what's your understanding of what "licensee" 13:15 means? 13:16 A. Having permission from the University to 13:17 use University-branded logos for apparel and 13:18 anything else.	00:00:20	Maffey-FINAL.4
15:08 - 15:12	Maffey, Meghan 2022-12-16 15:08 Q. Before this phone call, this conversation, 15:09 is that something that you even thought about in 15:10 terms of when you reached out to Vintage Brand, 15:11 whether they were a licensed vendor of Penn State or 15:12 not?	00:00:11	Maffey-FINAL.5
15:13 - 15:14	Maffey, Meghan 2022-12-16 15:13 A. No. I would say I was -- I did not think 15:14 about it.	00:00:05	Maffey-FINAL.6
15:22 - 16:18	Maffey, Meghan 2022-12-16 15:22 Q. I understand you're represented here in 15:23 this deposition by Mr. Snyder; is that correct? 15:24 A. Yes. 15:25 Q. When did that -- what's your understanding 16:01 Meghan Maffey 16:02 of when Mr. Snyder was retained on your behalf; do 16:03 you recall the date? 16:04 A. A few weeks ago. 16:05 Q. Were there any communications related to 16:06 the Penn State case, any communications to you, with 16:07 you, before Mr. Snyder got involved? 16:08 A. No. 16:09 Q. Is it your understanding that Mr. Snyder 16:10 has been retained by the Penn State Alumni 16:11 Association? 16:12 A. Yes. 16:13 Q. Are you paying for Mr. Snyder to represent 16:14 you in this matter? 16:15 A. No.	00:01:05	Maffey-FINAL.7

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DESIGNATION	SOURCE	DURATION	ID
	16:16 Q. Is that being handled by the Penn State 16:17 Alumni Association, to your knowledge? 16:18 A. Yes.		
16:25 - 17:04  P-27.1.1	Maffey, Meghan 2022-12-16 16:25 Q. This has been marked as Exhibit 30 at the 17:01 Meghan Maffey 17:02 top. 17:03 (Exhibit Maffey-30 was marked 17:04 for identification.)	00:00:04	Maffey-FINAL.8
17:08 - 17:12	Maffey, Meghan 2022-12-16 17:08 Does this look familiar at all? 17:09 A. Yes. 17:10 Q. Is this a copy of a subpoena that you 17:11 received? 17:12 A. Yes, I believe so.	00:00:14	Maffey-FINAL.9
17:24 - 18:02  P-27.4.1	Maffey, Meghan 2022-12-16 17:24 Q. Did you search for any of the documents 17:25 requested here at 1, 2, and 3? 18:01 Meghan Maffey 18:02 A. Apologies. I'm just re-reading. Yes, I	00:00:11	Maffey-FINAL.10
18:03 - 18:03	Maffey, Meghan 2022-12-16 18:03 have an email that I sent over.	00:00:05	Maffey-FINAL.11
18:08 - 18:18  P-73.1.1	Maffey, Meghan 2022-12-16 18:08 Q. I'm going to put up Exhibit 31 here. 18:09 (Exhibit Maffey-31 was marked 18:10 for identification.) 18:11 BY MR. FETTERS: 18:12 Q. We have an initial email, August -- 18:13 actually, that may not be the initial one, but a 18:14 response to an email from you. We'll get into the 18:15 content of these a little bit later. 18:16 I'm going to scroll down and see if 18:17 these are the emails that you are referring to. 18:18 A. Yes.	00:00:25	Maffey-FINAL.12
18:19 - 18:22	Maffey, Meghan 2022-12-16 18:19 Q. Are you aware of any other emails besides 18:20 these ones in terms of your communications with 18:21 Vintage Brand? 18:22 A. No.	00:00:09	Maffey-FINAL.13

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DESIGNATION	SOURCE	DURATION	ID
20:13 - 24:05	Maffey, Meghan 2022-12-16	00:04:03	Maffey-FINAL.14
20:13	Fair to assume you went to Penn State		
20:14	University?		
20:15	A. Yes.		
20:16	Q. What years were you there?		
20:17	A. 2013 to 2017.		
20:18	Q. Did you earn a degree?		
20:19	A. Yes.		
20:20	Q. What was the degree?		
20:21	A. Journalism.		
20:22	Q. Any graduate work?		
20:23	A. No.		
20:24	Q. When you were at Penn State, did you		
20:25	participate in any athletics?		
21:01	Meghan Maffey		
21:02	A. I was a club sport supervisor. So not the		
21:03	D1 athletics; the club teams.		
21:04	Q. And how about, does Penn State have a		
21:05	Greek system?		
21:06	A. They do.		
21:07	Q. Did you participate in the Greek system?		
21:08	A. I did.		
21:09	Q. Which sorority were new?		
21:10	A. Gamma Phi Beta.		
21:11	Q. Any other activities with Penn State, like		
21:12	participation on Panhellenic or participation in		
21:13	other organizations that weren't just strictly, you		
21:14	know, going to classes and things like that?		
21:15	A. Yes.		
21:16	Q. Can you tell me what those were?		
21:17	A. Her Campus at Penn State, The Daily		
21:18	Collegian, Penn State Homecoming, club sports, Gamma		
21:19	Phi Beat. I believe that's it.		
21:20	Q. Daily Collegian, is that the newspaper at		
21:21	Penn State?		
21:22	A. Yes.		
21:23	Q. I take it you were a journalist for		
21:24	that --		
21:25	A. No.		
22:01	Meghan Maffey		

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DESIGNATION	SOURCE	DURATION	ID
22:02	Q. -- periodical?		
22:03	What did you do for the Daily		
22:04	Collegian?		
22:05	A. I photographed. I was a photographer.		
22:06	Q. You mentioned Homecoming. What's entailed		
22:07	in Homecoming? You were on a committee of some		
22:08	sort, presumably?		
22:09	A. Yes. All four years of college.		
22:10	Q. What would that committee do?		
22:11	A. Select the Homecoming -- or select		
22:12	students at the University who had been nominated		
22:13	for Homecoming court, as well as oversee the		
22:14	organizations participating in Penn State		
22:15	Homecoming.		
22:16	Q. I've heard reference to this really big		
22:17	fundraising dance marathon at Penn State.		
22:18	A. Yes.		
22:19	Q. Is that part of Homecoming or something		
22:20	else?		
22:21	A. No. But I was also included -- I also was		
22:22	involved in THON. Apologies.		
22:23	Q. No problem. Can you tell me, just give me		
22:24	a summary -- if someone who's never heard of that,		
22:25	what is that?		
23:01	Meghan Maffey		
23:02	A. Penn State dance marathon is a 46-hour no		
23:03	sitting, no sleeping dance marathon that raises		
23:04	money for kids with cancer for pediatric research at		
23:05	the Hershey Medical Center for the Four Diamonds		
23:06	Fund.		
23:07	Q. And then you mentioned club sports. I		
23:08	think you've already talked about that; is that		
23:09	right?		
23:10	A. Yes.		
23:11	Q. And then Gamma Phi Beta, you've mentioned		
23:12	that as well.		
23:13	Did you have any leadership roles		
23:14	with Gamma Phi Beta?		
23:15	A. Yes. I was philanthropy chair.		
23:16	Q. Sounds like you were pretty involved in		
23:17	college; is that a fair statement?		

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DESIGNATION	SOURCE	DURATION	ID
	23:18 A. Yes.		
	23:19 Q. A lot of people -- and I say this is true		
	23:20 of myself -- college is a special time because it		
	23:21 occurs, you know, in a formative time in people's		
	23:22 lives. It just really was a special experience for		
	23:23 many people, not all.		
	23:24 Would that be true of you, that it		
	23:25 was a pretty special, formative experience for you?		
	24:01 Meghan Maffey		
	24:02 A. Yes.		
	24:03 Q. Penn State hold a pretty special place in		
	24:04 your heart?		
	24:05 A. Of course.		
24:06 - 24:13	Maffey, Meghan 2022-12-16	00:00:21	Maffey-FINAL.15
	24:06 Q. We'll talk a little bit about your		
	24:07 involvement in the Alumni Association in a minute,		
	24:08 but I wanted to follow up with you first about your		
	24:09 employment background. It sounds like you currently		
	24:10 work with National Geographic; is that right?		
	24:11 A. Yes.		
	24:12 Q. What do you do for National Geographic?		
	24:13 A. I do digital marketing.		
24:14 - 24:19	Maffey, Meghan 2022-12-16	00:00:16	Maffey-FINAL.16
	24:14 Q. If someone's really not familiar with		
	24:15 digital marketing, could you give just an example of		
	24:16 what that might entail?		
	24:17 A. On-air promotions for National Geographic		
	24:18 channel and National Geographic Wild shows and		
	24:19 documentaries.		
24:24 - 25:11	Maffey, Meghan 2022-12-16	00:01:07	Maffey-FINAL.17
	24:24 Q. Yeah. I think earlier you touched on your		
	24:25 job role at National Geographic has some connection		
	25:01 Meghan Maffey		
	25:02 to trademark. I was just curious, like, if you		
	25:03 could explain that a little bit more. How?		
	25:04 A. Sure. My previous role at National		
	25:05 Geographic was technical operations where I oversaw		
	25:06 film distribution for international and domestic		
	25:07 film festivals and award shows, ensuring that our		
	25:08 distributors used the yellow border appropriately,		

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DESIGNATION	SOURCE	DURATION	ID
	25:09 making sure that it's National Geographic channel; 25:10 just ensuring that all of the branding and the 25:11 credits was correct, things like that.		
25:19 - 25:24	Maffey, Meghan 2022-12-16	00:00:16	Maffey-FINAL.18
	25:19 Q. Did you receive any training on, you know, 25:20 trademark laws that, you know, this is what 25:21 constitutes a trademark under the law, that type of 25:22 specific legal information? 25:23 A. No. We have a department that does that 25:24 for us.		
25:25 - 26:03	Maffey, Meghan 2022-12-16	00:00:06	Maffey-FINAL.19
	25:25 Q. What is your current title with National 26:01 Meghan Maffey 26:02 Geographic? 26:03 A. Associate project manager of marketing.		
26:13 - 26:15	Maffey, Meghan 2022-12-16	00:00:04	Maffey-FINAL.20
	26:13 Q. Have you ever been employed by 26:14 Pennsylvania State University? 26:15 A. No.		
26:22 - 27:06	Maffey, Meghan 2022-12-16	00:00:24	Maffey-FINAL.21
	26:22 Q. Let's talk a little bit about the DC Penn 26:23 State Alumni Association. I understand you're 26:24 affiliated with that organization; is that correct? 26:25 A. Yes. 27:01 Meghan Maffey 27:02 Q. How so? 27:03 A. I am the president of the DC Metro -- the 27:04 Metro Wash -- I'm the president of Metro Washington, 27:05 DC chapter of the Penn State Alumni Association. 27:06 Apologies. It's long.		
27:07 - 27:12	Maffey, Meghan 2022-12-16	00:00:14	Maffey-FINAL.22
	27:07 Q. No worries. If we just call it "the DC 27:08 Chapter," will that smooth things out? 27:09 A. Yes. 27:10 Q. How long have you been president of the DC 27:11 Chapter? 27:12 A. A year and a half.		
27:13 - 27:19	Maffey, Meghan 2022-12-16	00:00:34	Maffey-FINAL.23
	27:13 Q. As president of the DC Chapter, what's		

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DESIGNATION	SOURCE	DURATION	ID
	27:14 involved in that; what are some of the things that		
	27:15 you do in that role?		
	27:16 A. I oversee my Board of Directors and we		
	27:17 fundraise on behalf of or for our scholarship and		
	27:18 Penn State THON, as well as I am -- I oversee the		
	27:19 active alumni in the area.		
27:20 - 30:21	Maffey, Meghan 2022-12-16	00:04:23	Maffey-FINAL.24
	27:20 Q. The DC Chapter of the Penn State Alumni		
	27:21 Association, about how many members are in that?		
	27:22 A. Three to 5000.		
	27:23 Q. Do you have a sense of how that compares		
	27:24 to other chapters? Is DC a big group, a medium		
	27:25 group, small group; are you able to quantify in any		
	28:01 Meghan Maffey		
	28:02 way like that?		
	28:03 A. We are one of the largest chapters, I		
	28:04 believe.		
	28:05 Q. You've been president for one-and-a-half		
	28:06 years. Did you have a leadership role before		
	28:07 becoming president?		
	28:08 A. Yes.		
	28:09 Q. What was that?		
	28:10 A. Communications.		
	28:11 Q. When did you become the communications		
	28:12 person for the DC Chapter?		
	28:13 A. 2020.		
	28:14 Q. And can you give me a summary of what		
	28:15 would be involved in serving as the communications		
	28:16 person?		
	28:17 A. All communications, all communications		
	28:18 that are -- or all communication that is sent to the		
	28:19 alumni in the area, as well as social media; and		
	28:20 positively, you know, communicating with the alumni		
	28:21 in the area.		
	28:22 Q. Before communications, did you have any		
	28:23 other leadership roles with the DC Chapter?		
	28:24 A. Yes.		
	28:25 Q. What were those?		
	29:01 Meghan Maffey		
	29:02 A. I was a fundraising lead for DC Diamonds,		

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DESIGNATION	SOURCE	DURATION	ID
29:03	which is our THON committee for the Alumni		
29:04	Association.		
29:05	Q. Do alumni participate in THON also or --		
29:06	A. Yes.		
29:07	Q. Is that something that you continue to do		
29:08	as well?		
29:09	A. Yes.		
29:10	Q. Would that be every year?		
29:11	A. Yes.		
29:12	Q. Can you explain to me -- I know just a		
29:13	little bit about it. Does it -- for you to		
29:14	participate, are you actually going back to Happy		
29:15	Valley and participating in person there, or are		
29:16	people able to participate remotely?		
29:17	A. You can participate both ways.		
29:18	Q. For you, do you go back to campus to		
29:19	participate?		
29:20	A. I do not.		
29:21	Q. How do you -- how is it done participating		
29:22	remotely? Do people then, for example, in the DC		
29:23	area get together, or are they doing it via Zoom,		
29:24	maybe, with the pandemic?		
29:25	A. Both. We have done both.		
30:01	Meghan Maffey		
30:02	Q. This is actually a dancing marathon where		
30:03	you have to dance continuously for a long period of		
30:04	time to raise money; is that how it works?		
30:05	A. You don't have to dance all 46 hours. You		
30:06	can -- you are awake for the 46 hours. There's a		
30:07	lot that goes on during THON.		
30:08	Q. What's your record for the longest		
30:09	duration that you danced for THON?		
30:10	A. I danced my senior year, so I was awake		
30:11	for 52 hours the year that I danced.		
30:12	Q. Wow. Impressive.		
30:13	So you talked about you're a		
30:14	fundraising lead. You've talked about		
30:15	communications and presidency. Any other leadership		
30:16	roles with the DC Chapter?		
30:17	A. Yes. I was sports chair.		
30:18	Q. What's involved as a sports chair?		

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DESIGNATION	SOURCE	DURATION	ID
	30:19 A. I work with, I worked with other chapters 30:20 of schools down here to set up rec leagues for 30:21 different sports for our alumni to participate in.		
31:04 - 32:05	Maffey, Meghan 2022-12-16 31:04 Q. So we've got sports chair, fundraising 31:05 lead, communications, president. Any other 31:06 leadership roles? 31:07 A. No. 31:08 Q. When did you first join the DC Chapter? 31:09 A. 2018. 31:10 Q. When you joined, did you immediately take 31:11 a leadership role or did you join as just a member 31:12 at first? 31:13 A. Just a member at first. 31:14 Q. And then when did you start -- I guess, 31:15 would the first leadership role have been sports 31:16 chair? 31:17 A. Mm-hmm. 31:18 Q. When did you start as sports chair? 31:19 A. 2019. 31:20 Q. And the DC alumni chapter, can you give me 31:21 a sense of some of the activities that are put on? 31:22 I understand the pandemic has maybe changed things a 31:23 little bit. But, you know, are there watch parties, 31:24 social, happy hours, things -- can you give me a 31:25 sense of, like, what's involved with the chapter? 32:01 Meghan Maffey 32:02 A. Sports, community service projects, Penn 32:03 State dance marathon fundraisers, watch parties for 32:04 football, happy hours, and professional development 32:05 opportunities.	00:01:24	Maffey-FINAL.25
32:06 - 32:08	Maffey, Meghan 2022-12-16 32:06 Q. Do you get compensated, paid in any way, 32:07 for your work with the DC Chapter? 32:08 A. No.	00:00:06	Maffey-FINAL.26
32:09 - 32:21	Maffey, Meghan 2022-12-16 32:09 Q. So it sounds like you're very involved 32:10 holding multiple leadership positions. I would 32:11 imagine you've donated a lot of your time to this 32:12 organization; is that accurate?	00:00:51	Maffey-FINAL.27

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DESIGNATION	SOURCE	DURATION	ID
	32:13 A. Yes.		
	32:14 Q. So, I guess, my question is why donate all		
	32:15 your time in this way?		
	32:16 A. To refer back to what you had mentioned		
	32:17 previously, I spent -- I was very involved at Penn		
	32:18 State while I was at the University. You asked me		
	32:19 if Penn State held a special place in my heart, and		
	32:20 it does. And I continue to -- I want to give back		
	32:21 to the University that has given so much to me.		
35:09 - 35:22	Maffey, Meghan 2022-12-16	00:00:39	Maffey-FINAL.28
	35:09 So if I wear a shirt that has the		
	35:10 logo of the university I went to, part of the reason		
	35:11 I do it is because I want people to know I like that		
	35:12 school, I want people to know I went to that school.		
	35:13 When you wear Penn State apparel with Penn State		
	35:14 logos on it, do you do it for that same reason?		
	35:15 A. No.		
	35:16 Q. Why do you do it?		
	35:17 A. As I previously mentioned, I have a lot of		
	35:18 school spirit.		
	35:19 Q. Is it fair to say then that when you wear		
	35:20 apparel decorated with Penn State logos, it's to		
	35:21 express your school spirit?		
	35:22 A. Yes.		
35:24 - 37:07	Maffey, Meghan 2022-12-16	00:01:58	Maffey-FINAL.29
	35:24 Let's talk a little bit about Vintage		
	35:25 Brand. You touched on this a little bit earlier,		
	36:01 Meghan Maffey		
	36:02 but I want to go back and flesh out some of those		
	36:03 details. If I recall correctly, I think you said		
	36:04 that you first heard about Vintage Brand because		
	36:05 another Alumni Association for another Big Ten		
	36:06 school was aware of Vintage Brand; is that right?		
	36:07 A. Yes. Yes.		
	36:08 Q. Can you tell me a little bit more about		
	36:09 that? Was there some email exchange between you and		
	36:10 that other person or a phone call? Can you tell me		
	36:11 a little bit more about how you became aware of		
	36:12 Vintage Brand?		
	36:13 A. We put on a Big Ten DC event and they had		

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DESIGNATION	SOURCE	DURATION	ID
	36:14 reached out to their contact at Vintage Brand and		
	36:15 that -- and that's how I learned.		
	36:16 Q. Then after you learned of that, what did		
	36:17 you do; did you go to Vintage Brand's website		
	36:18 yourself?		
	36:19 A. I did.		
	36:20 Q. Do you recall roughly when this might have		
	36:21 been? I think your emails were in the summer of		
	36:22 2022. We can take a look at those. Would that have		
	36:23 been around the time you went to Vintage Brand's		
	36:24 website?		
	36:25 A. Yes.		
	37:01 Meghan Maffey		
	37:02 Q. At that time did you observe any product		
	37:03 offerings that were related to Penn State?		
	37:04 A. Yes.		
	37:05 Q. So in the summer of 2022 -- I'm going to		
	37:06 put up this exhibit again just to get a better sense		
	37:07 of the dates. If I scroll down -- this is		
37:08 - 37:17	Maffey, Meghan 2022-12-16	00:00:28	Maffey-FINAL.30
 P-73.1.2	37:08 Exhibit 31. We have -- sort of at the bottom of		
	37:09 this page there's an email. It looks like your		
	37:10 name, Meg Maffey, at the bottom under "All the		
	37:11 best."		
	37:12 Do you see that?		
	37:13 A. Yes.		
	37:14 Q. Is this the initial communication that you		
	37:15 had with Vintage Brand, or was there anything that		
	37:16 preceded this?		
	37:17 A. That's it.		
37:18 - 38:02	Maffey, Meghan 2022-12-16	00:00:25	Maffey-FINAL.31
 P-73.1.3	37:18 Q. There's a response from someone named Jay		
	37:19 L. above that. Do you see that?		
	37:20 A. Yes.		
	37:21 Q. The date there is August 1, 2022. That's		
	37:22 at the top right; is that right?		
	37:23 A. Yes.		
	37:24 Q. Do you know if he responded that same day		
	37:25 that you sent that message?		
	38:01 Meghan Maffey		

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DESIGNATION	SOURCE	DURATION	ID
	38:02 A. I don't recall.		
38:03 - 38:24  P-73.1.1	Maffey, Meghan 2022-12-16 38:03 Q. If this communication occurred August 1, 38:04 2022 or thereabouts, is it your sense, then, that 38:05 you would have visited and reviewed the Vintage 38:06 Brand website perhaps in late July 2022? 38:07 A. Yes. 38:08 Q. Or possibly August 1, 2022, the same day? 38:09 A. Yes. 38:10 Q. Would that have been your first time 38:11 reviewing the Vintage Brand website? 38:12 A. Yes. 38:13 Q. You specifically recall looking at product 38:14 offerings related to Penn State during this time? 38:15 A. Yes. 38:16 Q. Can you give me an example of some of the 38:17 artwork that you recall seeing on the Vintage Brand 38:18 website as it relates to Penn State? 38:19 A. Yes. There was branded T-shirts, 38:20 sweatshirts, and long sleeves is what I recall. 38:21 Q. When you say "branded," do you mean like 38:22 the logos and things like that related to Penn 38:23 State? 38:24 A. Yes.	00:01:16	Maffey-FINAL.32
38:25 - 39:04	Maffey, Meghan 2022-12-16 38:25 Q. Which ones specifically do you recall 39:01 Meghan Maffey 39:02 seeing? 39:03 A. God. I can't recall which one. 39:04 Q. None at all?	00:00:15	Maffey-FINAL.33
39:05 - 39:10	Maffey, Meghan 2022-12-16 39:05 A. I can't recall -- I can't confirm which 39:06 one, but I don't want you to -- I don't -- it would 39:07 be... 39:08 Q. It's okay if you can't recall. "I don't 39:09 know" or "I can't recall" is a perfectly fine 39:10 answer, if that's true.	00:00:25	Maffey-FINAL.34
39:11 - 43:07	Maffey, Meghan 2022-12-16 39:11 A. The paw print and the chipmunk logo.	00:06:13	Maffey-FINAL.35

Maffey-FINAL

DESIGNATION	SOURCE	DURATION	ID
39:12	Q. If someone's not familiar what either of		
39:13	those might refer to, can you describe what the paw		
39:14	print logo looks like?		
39:15	A. It is the Penn State paw print. It's navy		
39:16	and white, as every Penn State logo is. It has a		
39:17	slash or a white -- the line, rounded line in the		
39:18	left, I believe the left side. But it is the Penn		
39:19	State paw print.		
39:20	Q. And the other one you mentioned was the		
39:21	chipmunk logo, I think. What's that one look like?		
39:22	A. It is the lion head, it is the Penn State		
39:23	lion head.		
39:24	Q. It's like a profile of the lion head; is		
39:25	that right?		
40:01	Meghan Maffey		
40:02	A. Correct.		
40:03	Q. When you visited Vintage Brand's website,		
40:04	how did you actually arrive at the website; was it a		
40:05	Google Search? Did you type in a specific URL to		
40:06	arrive there? Do you recall how you arrived at the		
40:07	website?		
40:08	A. I don't recall.		
40:09	Q. Do you recall looking at a home page first		
40:10	or did you go immediately into web pages that were		
40:11	related to Penn State?		
40:12	A. Home page.		
40:13	Q. Do you recall anything about how the home		
40:14	page was organized, the look of it, the information		
40:15	that was contained there?		
40:16	A. It had colleges. It had a few titles that		
40:17	you could click on at the top, football, baseball,		
40:18	and colleges, as well as Vintage Brand's name across		
40:19	the top of the screen.		
40:20	Q. When you -- how did you then go about		
40:21	navigating; once you landed at the home page, what		
40:22	did you do next?		
40:23	A. I clicked on colleges and found Penn State		
40:24	University.		
40:25	Q. Did you click on any of the tabs to just		
41:01	Meghan Maffey		
41:02	have a look around and see what else was on the		

Maffey-FINAL

DESIGNATION	SOURCE	DURATION	ID
	41:03 website?		
	41:04 A. No.		
	41:05 Q. So just went to the home page and then the		
	41:06 Penn State tab; is that right?		
	41:07 A. Home page, colleges, Penn State.		
	41:08 Q. And then from there what did you do?		
	41:09 A. Scrolled to see what was, what Vintage		
	41:10 Brands had to offer with Penn State's logo on it,		
	41:11 and then exited.		
	41:12 Q. Did you use the website, Vintage Brand		
	41:13 website to obtain contact information for the emails		
	41:14 that you sent, or did you have that already?		
	41:15 A. I don't recall.		
 P-73.1.1	41:16 Q. Going back to Exhibit 31, which I think is		
	41:17 still on your screen there. It looks like the email		
	41:18 address that you were using is pennstateedc@gmail,		
	41:19 [sic]; is that right?		
	41:20 A. It's pennstatedc@gmail.com.		
	41:21 Q. Thank you.		
	41:22 Then it looks like these were emails		
	41:23 to customerservice@shopvintagebrand.com. Did you		
	41:24 send an email or did you use -- I think Vintage		
	41:25 Brand has, like, a chat, a live chat function as		
	42:01 Meghan Maffey		
	42:02 well. Do you recall how you communicated with		
	42:03 Vintage Brand?		
	42:04 A. Email.		
	42:05 Q. Email. And I want to make sure I have a		
	42:06 good understanding of this. You touched on it		
	42:07 already. But you don't recall whether you got this		
	42:08 email address customerservice@shopvintagebrand.com,		
	42:09 whether you got that email address based on your		
	42:10 review of the website versus something else?		
	42:11 A. Correct.		
	42:12 Q. Is it possible that your contact with the		
	42:13 Washington DC alumni chapter for the other school		
	42:14 gave you this email address?		
	42:15 A. Yes.		
	42:16 Q. Would you have that in -- if you were to		
	42:17 search your email or this email address, would you		
	42:18 be able to search that to find out if the person		



Maffey-FINAL

DESIGNATION	SOURCE	DURATION	ID
	42:19 from the other Big Ten school actually supplied you		
	42:20 with this email address?		
	42:21 A. Probably.		
	42:22 Q. Did you reach out to any other online		
	42:23 retailers or otherwise, any other companies in		
	42:24 relation to this request in the summer of 2022 of		
	42:25 trying to get some products for an event?		
	43:01 Meghan Maffey		
	43:02 A. Yes.		
	43:03 Q. How many other companies did you reach out		
	43:04 to?		
	43:05 A. Over a hundred.		
	43:06 Q. Can you give me some examples of which		
	43:07 companies would be entailed in that over a hundred?		
43:08 - 43:16	Maffey, Meghan 2022-12-16	00:00:47	Maffey-FINAL.36
	43:08 A. The Student Bookstore, Lion's Pride, local		
	43:09 restaurants and bars in DC, our Penn State watch		
	43:10 party bars. That's a few.		
	43:11 Q. How many can you recall that were		
	43:12 companies that sold apparel?		
	43:13 A. A handful.		
	43:14 Q. Do you remember the names specifically?		
	43:15 A. Lion's Pride, Student Bookstore,		
	43:16 McLanahan's.		
43:17 - 44:25	Maffey, Meghan 2022-12-16	00:01:46	Maffey-FINAL.37
	43:17 Q. Lion's Pride, what is that?		
	43:18 A. A local Penn State store downtown.		
	43:19 Q. Does Lion's Pride also have a website, or		
	43:20 is it just brick and mortar only?		
	43:21 A. I believe they have a website.		
	43:22 Q. You said the Bookstore, Penn State		
	43:23 Bookstore is, I assume, what you're referring to		
	43:24 there; is that true?		
	43:25 A. Yes.		
	44:01 Meghan Maffey		
	44:02 Q. And the Penn State Bookstore, they have a		
	44:03 website as well where you can purchase apparel		
	44:04 online?		
	44:05 A. Yes.		
	44:06 Q. Did you -- for these other apparel		

Maffey-FINAL

DESIGNATION	SOURCE	DURATION	ID
	44:07 companies, did you also look at their websites and		
	44:08 their product offerings before reaching out to those		
	44:09 companies?		
	44:10 A. Yes.		
	44:11 Q. Is it possible that when -- you testified		
	44:12 earlier that you recall looking at Vintage Brand's		
	44:13 product offerings and you recalled seeing two of		
	44:14 those logos that we talked about. Is it possible		
	44:15 that you're thinking of one of those other		
	44:16 companies, or are you pretty firm that you recall		
	44:17 seeing those on Vintage Brand's website?		
	44:18 A. I am pretty confident that it is -- that		
	44:19 it was those on Vintage Brand's website.		
	44:20 Q. How many websites do you recall looking at		
	44:21 as you were sending out these emails to about a		
	44:22 hundred or so companies in the summer of 2022?		
	44:23 A. A hundred.		
	44:24 Q. So you looked at a hundred websites?		
	44:25 A. Yes.		
45:15 - 46:04	Maffey, Meghan 2022-12-16	00:00:47	Maffey-FINAL.38
	45:15 Q. Ms. Maffey, we're, I think, getting close		
	45:16 here. I just have a few additional questions. I'm		
	45:17 going to put Exhibit 31 back up. Bear with me one		
	45:18 second. Do you see this on your screen?		
	45:19 A. Yes.		
	45:20 Q. So Exhibit 31, these are the email		
	45:21 communications with Vintage Brand in summer of 2022.		
	45:22 And go ahead and take a moment and read this to		
	45:23 yourself just so you're familiar with the content		
	45:24 and I'll ask you a follow-up question once you're		
	45:25 done.		
	46:01 Meghan Maffey		
	46:02 A. I'm good. I've re-read it.		
	46:03 Q. I apologize. I probably already asked you		
	46:04 this, but I was wracking my brain whether I did:		
46:05 - 46:16	Maffey, Meghan 2022-12-16	00:00:48	Maffey-FINAL.39
	46:05 Can you just summarize, basically, what it is that		
	46:06 you were asking for from Vintage Brand?		
	46:07 A. Yes. A donation from Vintage Brand to be		
	46:08 raffled off at one of our four watch parties that we		

Maffey-FINAL

DESIGNATION	SOURCE	DURATION	ID
	46:09 hosted this football season for the -- and the funds		
	46:10 that are raised through these raffles from these		
	46:11 donations is donated directly back to Penn State,		
	46:12 first-year Penn State students who need financial		
	46:13 aid.		
	46:14 So our chapter raises funds to donate		
	46:15 money towards Washington, DC, the DMV area students		
	46:16 who apply through our scholarship award program.		
46:17 - 48:03	Maffey, Meghan 2022-12-16	00:01:51	Maffey-FINAL.40
 P-73.1.3	46:17 Q. And after your communication, the message		
	46:18 from Jay L. was: Thank you for your interest in		
	46:19 Vintage Brand. We have forwarded your information		
	46:20 to the appropriate internal department. If they are		
	46:21 interested, they will be in contact.		
	46:22 Did I read that correctly?		
	46:23 A. Yes.		
	46:24 Q. As we already discussed at the top of		
	46:25 that, there's a date line of August 1, 2022. If we		
	47:01 Meghan Maffey		
 P-73.2.1	47:02 scroll down in Exhibit 31, there's a message from		
	47:03 the pennstatedc@gmail.com address and that one's		
	47:04 dated July 31, 2022.		
	47:05 Do you see that?		
	47:06 A. Yes.		
	47:07 Q. And then there's some content below as		
	47:08 well. This one is to partners@vintagebrand.com. Do		
	47:09 you know how you got that email address,		
	47:10 partners@vintagebrand.com?		
	47:11 A. I don't recall.		
 P-73.1.3	47:12 Q. But if we go back up, at least the		
	47:13 response earlier was coming from		
	47:14 customerservice@shopvintagebrand.com. Do you see		
	47:15 that?		
	47:16 A. I do.		
	47:17 Q. Do you know if your initial communication		
	47:18 was to customerservice@shopvintagebrand.com versus		
	47:19 partners@vintagebrand.com?		
	47:20 A. I don't recall.		
	47:21 Q. In this email -- this is written by you,		
	47:22 yes?		

Maffey-FINAL

DESIGNATION	SOURCE	DURATION	ID
 P-73.1.1	<p>47:23 A. Yes. It's the same email as above.</p> <p>47:24 Q. So is it -- I was going to ask, is this</p> <p>47:25 basically a copy and paste of the earlier</p> <p>48:01 Meghan Maffey</p> <p>48:02 communication?</p> <p>48:03 A. It's the exact same email.</p>		
48:04 - 48:18	Maffey, Meghan 2022-12-16	00:00:33	Maffey-FINAL.41
 P-73.4.1	<p>48:04 Q. There's another communication from</p> <p>48:05 pennstatedc@gmail.com, again, to</p> <p>48:06 partners@vintagebrand.com. This one, though, is</p> <p>48:07 dated August 14, 2022.</p> <p>48:08 Do you see that?</p> <p>48:09 A. Yes.</p> <p>48:10 Q. And the message is: I wanted to circle</p> <p>48:11 back and see if you would be interested in</p> <p>48:12 participating and donating for this upcoming</p> <p>48:13 football season.</p> <p>48:14 Did I read that correctly?</p> <p>48:15 A. Yes.</p> <p>48:16 Q. Did you ever hear back from Vintage Brand</p> <p>48:17 other than this first response from Jay L.?</p> <p>48:18 A. No.</p>		
48:19 - 51:10	Maffey, Meghan 2022-12-16	00:04:29	Maffey-FINAL.42
	<p>48:19 Q. This message here, I noticed that if you</p> <p>48:20 see on your screen, Exhibit 31, it's the message</p> <p>48:21 that Jay L. responded to, did you send a similar</p> <p>48:22 message like this to those other companies you</p> <p>48:23 mentioned reaching out to?</p> <p>48:24 A. Yes. I sent the same email.</p> <p>48:25 Q. Exact same email?</p> <p>49:01 Meghan Maffey</p> <p>49:02 A. Exact same email.</p> <p>49:03 Q. With a hundred companies you were reaching</p> <p>49:04 out to, you talked about volunteering your time, I</p> <p>49:05 would imagine you were trying to do this as</p> <p>49:06 efficiently and quickly as possible; is that fair?</p> <p>49:07 A. No.</p> <p>49:08 Q. Why send the exact same email to all of</p> <p>49:09 those companies then?</p> <p>49:10 A. I had a lot of emails to send to different</p>		

 Clear

Maffey-FINAL

DESIGNATION	SOURCE	DURATION	ID
49:11	companies; however, I took time and researched		
49:12	companies that sold Penn State items. But to say		
49:13	that I was doing it as quickly as possible and		
49:14	efficiently is incorrect.		
49:15	Q. Tell me a little bit about the research		
49:16	that you did. Can you explain that to me? How		
49:17	would you go about doing the research on the		
49:18	companies that you reached out to?		
49:19	A. I researched companies that were owned by		
49:20	Penn State different alumni; reached out to Penn		
49:21	State businesses in State College; researched		
49:22	companies that sold college apparel and college		
49:23	items, as well as companies that were owned by Penn		
49:24	State alumni.		
49:25	Q. What were you looking for specifically		
50:01	Meghan Maffey		
50:02	when you were doing this research?		
50:03	A. Any items to be donated, as mentioned		
50:04	previously, to raffle off to our alumni and our --		
50:05	and anyone who came to any of our events to raise		
50:06	funds for students who need financial aid in the		
50:07	Washington, DC, metro area as they enter their first		
50:08	year of Penn State University.		
50:09	Q. I mean, when you were researching these		
50:10	companies before reaching out to them, you talked		
50:11	about, you know, looking for companies that were		
50:12	owned by Penn State alumni, for example. But other		
50:13	than that, those things that you identified, were		
50:14	you researching for anything else in particular?		
50:15	A. Are you asking if I was researching for a		
50:16	specific item?		
50:17	Q. Could be a specific item, but anything		
50:18	else that you considered when you were looking. For		
50:19	example, if you found one company online but then		
50:20	decided no, I'm not going to ask them; you know,		
50:21	what would have been the reason for that is kind of		
50:22	what I'm getting at?		
50:23	A. If they were not, if they did not have		
50:24	anything that had Penn State, Penn State's -- if the		
50:25	company has Penn State items and apparel on their		
51:01	Meghan Maffey		

Maffey-FINAL

DESIGNATION	SOURCE	DURATION	ID
	51:02 website, that is what I was looking for; however,		
	51:03 there was a company that was owned by a Penn-Stater		
	51:04 and she donated something that was not related to		
	51:05 Penn State.		
	51:06 Q. I understand. That makes sense now.		
	51:07 Anything else like that that went		
	51:08 into your evaluation, or is what you've described		
	51:09 basically it?		
	51:10 A. That's it.		
52:03 - 52:09	Maffey, Meghan 2022-12-16	00:00:26	Maffey-FINAL.43
	52:03 Following up on what Mr. Fetters was		
	52:04 just asking you, when you were reviewing companies		
	52:05 to possibly ask for donations, did it matter to you		
	52:06 whether the company was authorized to use Penn		
	52:07 State's logos? Or maybe the better question is,		
	52:08 would it matter -- have mattered to you if a company		
	52:09 was not authorized to use Penn State's logos?		
52:10 - 52:13	Maffey, Meghan 2022-12-16	00:00:19	Maffey-FINAL.44
	52:10 A. I wouldn't -- I don't think that I would		
	52:11 be comfortable accepting a donation that has Penn		
	52:12 State branded -- like Penn State's logo on it if not		
	52:13 authorized by the University.		
52:14 - 53:10	Maffey, Meghan 2022-12-16	00:01:06	Maffey-FINAL.45
	52:14 Q. So we were talking about when you've		
	52:15 reviewed the Vintage Brand website. Going back a		
	52:16 little bit, it sounds like prior to August of this		
	52:17 year you had heard about Vintage Brand before that,		
	52:18 based on your contact with the other Big Ten		
	52:19 Universities, correct?		
	52:20 A. Yes.		
	52:21 Q. Is it possible that you had looked at the		
	52:22 Vintage Brand website before August of this year		
	52:23 when you were, when you were having those dealings		
	52:24 with the other Big Ten school?		
	52:25 A. No. I had never heard of Vintage Brand		
	53:01 Meghan Maffey		
	53:02 before, before the event with the other Big Ten		
	53:03 leaders.		
	53:04 Q. I'm sorry. Was that event, was that the		
	53:05 event that occurred in August of 2022?		

Maffey-FINAL

DESIGNATION	SOURCE	DURATION	ID
	53:06 A. Yes.		
	53:07 Q. When you visited the Vintage Brand		
	53:08 website, did you look at any other, any pages		
	53:09 related to schools other than Penn State?		
	53:10 A. No.		
54:03 - 54:13	Maffey, Meghan 2022-12-16	00:00:34	Maffey-FINAL.46
	54:03 Q. When you visited it, there was -- you've		
	54:04 testified -- I want to make clear. When you visited		
	54:05 it, there was a page for Penn State gear available?		
	54:06 A. Yes.		
	54:07 Q. Is that right?		
	54:08 A. Yes.		
	54:09 Q. Do you remember if any of the products you		
	54:10 saw on that page had the words "Penn State" on it,		
	54:11 on them?		
	54:12 A. I can't recall "Penn State," but -- I		
	54:13 can't recall "Penn State."		
54:14 - 54:15	Maffey, Meghan 2022-12-16	00:00:04	Maffey-FINAL.47
	54:14 Q. Is it possible?		
	54:15 A. Yes. Of course.		
54:16 - 54:22	Maffey, Meghan 2022-12-16	00:00:26	Maffey-FINAL.48
	54:16 Q. Do you remember if you saw any products		
	54:17 for sale that had -- I'm going to call it the		
	54:18 university seal, which you might know what I mean?		
	54:19 It's the circle with, you know, the horses and		
	54:20 stuff. Did you see any products on the Vintage		
	54:21 Brand site that had that Penn State seal on them?		
	54:22 A. I can't recall.		
54:23 - 54:24	Maffey, Meghan 2022-12-16	00:00:05	Maffey-FINAL.49
	54:23 Q. Is it possible?		
	54:24 A. Yes.		
54:25 - 55:13	Maffey, Meghan 2022-12-16	00:00:47	Maffey-FINAL.50
	54:25 Q. When you looked -- setting aside any		
	55:01 Meghan Maffey		
	55:02 recent review you've done going back to when you		
	55:03 looked at the Vintage Brand website, did you see any		
	55:04 language on the website speaking to whether Vintage		
	55:05 Brand has any affiliation or relationship to Penn		
	55:06 State?		

Maffey-FINAL

DESIGNATION	SOURCE	DURATION	ID
	55:07 A. No.		
	55:08 Q. Did you see any language that you might		
	55:09 consider legalese or a disclaimer on the website?		
	55:10 A. No.		
	55:11 Q. And was it your impression that Vintage		
	55:12 Brand was authorized to use Penn State's trademarks?		
	55:13 A. Yes.		
55:14 - 55:19	Maffey, Meghan 2022-12-16	00:00:22	Maffey-FINAL.51
	55:14 Q. You spoke a little bit about how you have		
	55:15 a lot of Penn State spirit and you devote a lot of		
	55:16 your time to the University and the Alumni Club. I		
	55:17 just want to confirm with you, the testimony you've		
	55:18 given today, has it all been true and accurate?		
	55:19 A. Yes.		
55:20 - 55:24	Maffey, Meghan 2022-12-16	00:00:17	Maffey-FINAL.52
	55:20 Q. And Penn State has not -- correct me if		
	55:21 I'm wrong, Penn State or the Alumni Club have not		
	55:22 given you any incentive or persuaded you to testify		
	55:23 in one -- or give certain answers; is that correct?		
	55:24 A. Yes. They have not done any of that.		
56:10 - 56:22	Maffey, Meghan 2022-12-16	00:00:46	Maffey-FINAL.53
	56:10 Q. Just briefly, Ms. Maffey, Ms. Eller just		
	56:11 asked you about other logos and designs. But I want		
	56:12 to make sure we have a clear record. The only logos		
	56:13 and designs that you actually recall seeing on the		
	56:14 Vintage Brand website were the paw print design and		
	56:15 the chipmunk design; is that what you testified to		
	56:16 earlier today?		
	56:17 A. Yes.		
	56:18 Q. We also talked about early in the		
	56:19 deposition, we talked about that initial phone call		
	56:20 you had with Ms. Eller. Do you recall that		
	56:21 testimony earlier today?		
	56:22 A. Yes.		
57:04 - 57:09	Maffey, Meghan 2022-12-16	00:00:20	Maffey-FINAL.54
	57:04 Q. Yeah. In the earlier testimony I asked --		
	57:05 we talked about how Ms. Eller mentioned on the phone		
	57:06 that Vintage Brand wasn't authorized to sell Penn		
	57:07 State products. And I asked before she said that on		

Maffey-FINAL

DESIGNATION	SOURCE	DURATION	ID
	57:08 the phone, was that something that you even thought		
	57:09 about, and I believe you said no.		
57:10 - 57:12	Maffey, Meghan 2022-12-16	00:00:32	Maffey-FINAL.55
	57:10 A. I -- with my knowledge of Penn State and		
	57:11 Penn State athletics, and spending four years at		
	57:12 a -- at the University, apologies, I in good faith		
57:13 - 58:02	Maffey, Meghan 2022-12-16	00:01:01	Maffey-FINAL.56
	57:13 would -- and -- can I rephrase everything I just		
	57:14 said?		
	57:15 Q. Sure.		
	57:16 A. I, I did not -- you're correct, I did not		
	57:17 think about the licensing, as my experience with		
	57:18 Penn State licensing is that if it has the logo on		
	57:19 it, it's trademarked through the University.		
	57:20 Q. So is it fair to say, and correct me if		
	57:21 it's not accurate, is it fair to say that you have		
	57:22 an assumption that if an item of apparel makes		
	57:23 reference to Penn State, that Penn State owns that		
	57:24 reference and it must be licensed; is that sort of		
	57:25 your operating assumption?		
	58:01 Meghan Maffey		
	58:02 A. Yes.		

PL Designations	00:12:31
DEF Counter	00:35:51
PL Counter-Counter	00:00:09
TOTAL RUN TIME	00:48:30



Documents linked to video:

P-27

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